

**From:** Clugston.Christopher@dorseylaw.com  
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**Subject:** Response to Opposition - Opposition No. 91,155,163

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**IN THE UNITED STATE PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

BEAR U.S.A., INC.,

**Opposer,**

**v.**

JEAN M. ROMEO,

**Applicant.**

**Opposition No.: 91155163**

**Serial No. 78/092,269**

**RESPONSE TO NOTICE OF OPPOSITION**

Applicant Jean M. Romeo (Romeo) responds to the Notice of Opposition of Opposer Bear U.S.A., Inc. (Bear). The numbered paragraphs below respond to the corresponding paragraph of Bear's Notice of Opposition.

1. Romeo is without information sufficient to admit or deny the allegations of this paragraph and, therefore, denies the same.
2. Romeo is without information sufficient to admit or deny the allegations of this paragraph and, therefore, denies the same.
3. Romeo is without information sufficient to admit or deny the allegations of this paragraph and, therefore, denies the same.
4. Romeo is without information sufficient to admit or deny the allegations of this paragraph and, therefore, denies the same.
5. Romeo denies the allegations of this paragraph.
6. Romeo denies that Bear has common law rights in any BEAR trademark. Romeo admits that Bear appears to be the owner of the listed registrations. Romeo is without information sufficient to admit or deny the remaining allegations of this paragraph and, therefore, denies the same.
7. Romeo denies the allegations of this paragraph.
8. Romeo denies the allegations of this paragraph.
9. Romeo denies the allegations of this paragraph.

**Affirmative Defense**

1. For its first affirmative defense, Romeo states that there is no likelihood of confusion between the mark Romeo seeks to register and any mark in which Bear has rights.

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